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**KFJC 89.7 FM 12345 El Monte Road, Los Altos Hills, California 94022**

November 23, 1997

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of

Amendment of Part 2 of the  
Commission's Rules to Allocate the  
455-456 MHz, and 459-460 MHz bands  
to the Mobile-Satellite Service

ET Docket No. 97-214

Comments of

KFJC -FM  
12345 El Monte Road  
Los Altos Hills, CA 94022

KFJC is a non-commercial, educational station serving the southern portion of the San Francisco Bay Area for almost 40 years. It its coverage of news, community events and sports, KFJC often relies on remote auxiliary broadcast services. Especially when and because installation of appropriate grade phone lines requires significant lead time (often not available for local events) and considerable financial expenditure (almost consistently not available for non-commercial stations), KFJC utilizes its two remote pickup units to transmit from locations throughout the community. Occasionally, meritous events from outside the community are broadcast utilizing the station's RPU's to relay live coverage over adverse terrain not within a single RPU's capability.

To conduct the above coverages, KFJC coordinates in advance of broadcast with the other stations licensed to the same frequencies as KFJC's RPU's. While all of these stations, mostly commercial, are extremely cooperative and willing to accommodate KFJC as much as possible, lead time required for frequency coordination is sufficient to limit KFJC's coverage of unexpected, last minute events. Since these events often involve up to four or more hours of continuous frequency use, coordination may involve compromise or containment of coverage.

Regarding the Commission's proposal to allocate the 455-456 MHz and 459-460 MHz bands for Little LEO operations, KFJC supports the Commission's stipulation "that the signal integrity of broadcast programming material must be maintained and that Little LEO operations will not be

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permitted to cause harmful interference to such auxiliary broadcast signals." KFJC also agrees with the Commission's statement that "the issues of spectrum sharing between Little LEO operations and incumbent operations in the 455-456 MHz and 459-460 MHz bands are complex and will be thoroughly explored in a future, separate proceeding that will focus on developing appropriate service and licensing rules."

KFJC's concern is that there will be economically motivated tests commissioned by well financed companies which show that spectrum sharing will cause no harmful interference to incumbent operations. Lacking resources to investigate such tests, or to conduct additional tests which might demonstrate measurable interference, KFJC is concerned that, after the spectrum is auctioned, it will be technically and financially difficult to determine the sources of interference, and to subsequently seek remedy. In these comments alone, KFJC's concerns are unsupported by experimental statistics which, for example, might apply Dynamic Channel Activity Assignment System to the 455-456 MHz and 459-460 MHz bands in order to determine if DCAAS works there as well as in the 148-149.9 MHz band, or which might reapply DCAAS in the 148-149.9 band in order to assess interference with usage comparable to that in the 455-456 MHz and 459-460 MHz bands.

KFJC definitely does not wish to act as a Luddite of broadcasting by inhibiting technological advancement and more efficient spectrum usage. However, as a non-commercial entity, KFJC is concerned that, after the fact, the station will have no avenue for redress of violations.

  
Robert Pelzel

Station Supervisor, KFJC-FM